

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

DERRICK PETROLEUM SERVICES,	§	
	§	
<i>Plaintiff,</i>	§	
v.	§	CASE NO. 4:14-cv-01520
	§	
PLS, INC.,	§	
	§	
<i>Defendant.</i>	§	

**PLAINTIFF'S TRIAL WITNESS LIST**

1. Yashodeep Deodhar  
Partner, Derrick Petroleum Services  
c/o Brendan Cook  
Brandon Caire  
Baker & McKenzie, LLP  
700 Louisiana, Suite 3000  
Houston, Texas 77002  
Tel.: 713-427-5000  
Fax: 713-427-5099

As the founder of Derrick Petroleum Services and the creator of the Oil & Gas Mergers & Acquisitions Database (the "Database"), Mr. Deodhar has relevant knowledge concerning the creation, development, and maintenance of the Database, the nature of the relationship between Derrick and PLS, Inc., PLS's suggestions concerning Database content, structure, and format, Derrick's expectations and the parties' negotiations leading to the execution of the parties' Memorandum of Understanding, and other issues relevant to ownership of the Database and the current status of the MOU.

2. Brian Lidsky (*adversely*)  
Managing Director, PLS, Inc  
c/o Eric Lipper  
HIRSCH & WESTHEIMER  
1415 Louisiana  
Houston, Texas 77002

As a former Derrick consultant and current employee of PLS, Inc. who first introduced the principals of each party, Mr. Lidsky has knowledge concerning the parties' negotiations leading to the execution of the parties' Memorandum of Understanding, the development of the Database, including any contributions made by PLS, and the parties' commercial relationship.

3. Ronyld Wise (*adversely*)  
Founder, PLS, Inc.  
c/o Eric Lipper  
HIRSCH & WESTHEIMER  
1415 Louisiana  
Houston, Texas 77002

As the founder of PLS, Inc., Mr. Wise has relevant knowledge concerning the nature of the relationship between Derrick and PLS, Inc., the parties' negotiations leading to the execution of the parties' Memorandum of Understanding, and other issues relevant to ownership of the Database and the current status of the MOU.

4. Richard Bernardy  
Managing Partner  
M1 Energy Capital  
808 Travis, Suite 401  
Houston, Texas, 77002  
Tel.: 713-300-1422  
(*facsimile unknown*)

As an investor in PLS, Inc., from 2008 through 2010, Mr. Bernardy has relevant knowledge concerning nature of the relationship between Derrick and PLS, Inc., the parties' negotiations leading to the execution of the parties' Memorandum of Understanding, and other issues relevant to ownership of the Database and the term of the MOU.

5. Nancy Miracle  
Digital Miracles, LLC  
c/o Brendan Cook  
Brandon Caire  
Baker & McKenzie, LLP  
700 Louisiana, Suite 3000  
Houston, Texas 77002  
Tel.: 713-427-5000  
Fax: 713-427-5099

As an expert in the field of forensic software analysis, Ms. Miracle intends to offer opinions regarding the content and origins of both data, structure, and analysis in the Database from a software perspective, as well as opinions as to the parties' respective contributions to Database content, structure, and analysis that bear on the issue of Database ownership. The scope and details of Ms. Miracle's opinions are further delineated in her Preliminary and Supplemental Expert Reports, Plaintiff's Exhibits 91 and 92.

6. Byron Egan  
Jackson Walker, LLP

Bank of America Plaza  
901 Main Street, Suite 6000  
Dallas, TX 75202  
Tel : 214.953.6000  
Fax : 214.953.5822

As an expert in the area of Texas partnerships, Mr. Egan intends to offer opinions in rebuttal to those offered by Plaintiff's Designated Expert Robert Ragazzo, including but not limited to opinions on aspects of the business relationship between PLS and Derrick for the period beginning on or about September 30, 2009. The scope and nature of Mr. Egan's opinions will be further delineated in his Expert Reports, to be filed early next week.

7. Jason Reimbold (*adversely*)  
Vice President, PLS Inc.  
Eric Lipper  
HIRSCH & WESTHEIMER  
1415 Louisiana  
Houston, Texas 77002

Mr. Reimbold has knowledge concerning PLS's knowledge concerning PLS's product lines prior to October 2009, including but not limited to a pre-existing database that PLS has alleged to have had in its possession prior to meeting Derrick. Mr. Reimbold's testimony will likely be presented by deposition in accordance the deposition designations and summary filed by Derrick on November 3, 2014.

8. Mangesh Hirve  
Operations Manager, Derrick Petroleum Services  
c/o Brendan Cook  
Brandon Caire  
Baker & McKenzie, LLP  
700 Louisiana, Suite 3000  
Houston, Texas 77002  
Tel.: 713-427-5000  
Fax: 713-427-5099

Mr. Hirve has relevant knowledge concerning the nature of the relationship between Derrick and PLS, Inc., PLS's suggestions concerning Database content, structure, and format, and other issues relevant to ownership and the term of the MOU. Mr. Hirve's testimony will likely be presented by deposition in accordance the deposition designations and summary filed by Derrick on November 3, 2014.

9. Naveen Seetharama  
Product Manager, Derrick Petroleum Services  
c/o Brendan Cook  
Brandon Caire  
Baker & McKenzie, LLP  
700 Louisiana, Suite 3000  
Houston, Texas 77002  
Tel.: 713-427-5000  
Fax: 713-427-5099

Mr. Seetharama has relevant knowledge concerning PLS's suggestions concerning Database content, structure, and format, and other issues relevant to ownership and the term of the MOU. Mr. Seetharama's testimony will likely be presented by deposition in accordance the deposition designations and summary filed by Derrick on November 3, 2014.

This witness list is preliminary and Plaintiff reserves the right to amend, modify, reduce or expand this list as trial progresses.

Respectfully submitted,

**BAKER & MCKENZIE LLP**

By: /s/ Brendan D. Cook  
Brendan D. Cook (*attorney-in-charge*)  
Fed. ID No. 5030  
State Bar No. 04721700  
Brendan.Cook@bakermckenzie.com  
Brandon E. Caire  
Fed. ID No. 1812322  
State Bar No. 24064991  
Brandon.Caire@bakermckenzie.com  
700 Louisiana, Suite 3000  
Houston, Texas 77002  
Tel.: 713-427-5000  
Fax: 713-427-5099

ATTORNEYS FOR PLAINTIFF

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served on lead counsel of record on this 7th day of November, 2014 by electronic mail, electronic filing, facsimile, hand delivery, and/or U.S. certified mail, return receipt requested:

Eric Lipper  
HIRSCH & WESTHEIMER  
1415 Louisiana  
Houston, Texas 77002  
[elipper@hirschwest.com](mailto:elipper@hirschwest.com)  
Tel: (713) 220-9181 / Fax: (713) 223-9319

*Attorney for Defendant PLS Inc.*



---

Brandon E. Caire